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October 1, 2024

VIA ECF

Honorable Magistrate Judge Victoria Reznik
United States District Court
Southern District of New York

Re: Guanda Betancourt v. Costco Wholesale Corporation
Docket Number: 23-cv-06075 (KMK) (VR)

Dear Hon. Magistrate Judge Reznik:

My office represents the Plaintiff Guanda Betancourt in the above referenced matter.

The parties respectfully submit this joint application to request a sixty (60) day extension of time to file the stipulation of dismissal since the plaintiff is awaiting the final lien amount from Medicare, and is in the process of resolving all of the plaintiff's questions relating to the settlement documents in this case.

Upon receipt, the executed closing documents will be exchanged and payment can be issued.

As per the Court's August 1, 2024 Order (D.E. #34), the deadline for the parties to file the stipulation of dismissal is October 1, 2024. The parties respectfully propose December 1, 2024 as the new deadline.

There have been no prior applications to extend this deadline. Thank you for the opportunity to address the Court in this matter.

Respectfully submitted,



Kenneth I. Beal

Cc: Via ECF – Ian E. Hannon, Esq.

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